



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JN/DKK/LB/CJN
F. #2017R05903

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 9, 2020

By Email and ECF

Michael Levy
Joan M. Loughnane
Sidley Austin LLP

David Bitkower
Matthew S. Hellman
Jenner & Block LLP

Re: United States v. Huawei Technologies Co., Ltd., et al.
Criminal Docket No. 18-457 (S-3) (AMD)

Dear Counsel:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019. See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendant.

This discovery is only being provided to Huawei Technologies Co., Ltd. and Huawei Device USA Inc. Although Huawei Device Co. Ltd. and Futurewei Technologies, Inc. are newly indicted defendants in this case, neither is entitled to this discovery because they are not parties to the protective order.

I. The Government's Discovery

Document Description	Category of Discovery Pursuant to Protective Order	Bates Range
Financial Institution Documents, Including Customer Account Information and Written Correspondence	Sensitive Discovery Material	DOJ_HUAWEI_A_0004428237 - DOJ_HUAWEI_A_0004435975 DOJ_HUAWEI_A_0004436373 - DOJ_HUAWEI_A_0004487081
Financial Institution Documents, Including Customer Account Information and Written Correspondence	Discovery Material	DOJ_HUAWEI_A_0004488049 – DOJ_HUAWEI_A_0004544327
Documents Related to Activities in Iran	Sensitive Discovery Material	DOJ_HUAWEI_A_0004435976 - DOJ_HUAWEI_A_0004436372
Documents Related to Activities in Iran	Discovery Material	DOJ_HUAWEI_A_0004487082 - DOJ_HUAWEI_A_0004488048

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Julia Nestor
 Alexander A. Solomon
 Julia Nestor
 David K. Kessler
 Sarah Evans
 Assistant United States Attorneys
 (718) 254-7000

DEBORAH L. CONNOR
Chief, Money Laundering and Asset
Recovery Section, Criminal Division
U.S. Department of Justice

By: /s/ Christian J. Nauvel
Laura Billings
Christian J. Nauvel
Trial Attorneys

JAY I. BRATT
Chief, Counterintelligence and Export
Control Section
National Security Division, U.S. Department
of Justice

By: /s/ Thea D. R. Kendler
Thea D. R. Kendler
David Lim
Trial Attorneys

cc: Clerk of the Court (AMD) (by ECF) (without Enclosures)